

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:11-CR-139
v.)	
)	The Honorable Liam O'Grady
MARIA TERESA SANCHEZ,)	
)	Sentencing Date: September 16, 2011
Defendant.)	
)	

**GOVERNMENT'S MOTION FOR DOWNWARD DEPARTURE
AND MEMORANDUM IN SUPPORT**

The United States of America, by Neil H. MacBride, United States Attorney for the Eastern District of Virginia, and Uzo E. Asonye, Assistant United States Attorney, hereby represents that the defendant, Maria Teresa Sanchez ("Sanchez" or "defendant"), has substantially assisted the government in its investigation and prosecution of other persons who have committed offenses, pursuant to Section 5K1.1 of the United States Sentencing Guidelines, and Title 18, United States Code, Section 3553(e), and accordingly moves the Court for a 50% reduction to the defendant's sentence.

I. Introduction

On March 25, 2011, the defendant pleaded guilty to a one count criminal information, which charged her with conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 1349. As part of her plea agreement, the defendant agreed to cooperate with the Federal Bureau of Investigation and the United States Attorney's Office. Since that time and prior to her plea, the defendant has provided substantial assistance in the investigation and

prosecution of other individuals involved in mortgage fraud in the Eastern District of Virginia. Accordingly, the United States files this motion for a downward departure pursuant to Section 5K1.1 of the United States Sentencing Guidelines (Substantial Assistance to Authorities) and 18 U.S.C. § 3553(e). The details and value of this cooperation are set forth below. The defendant will appear before the Court for sentencing on Friday, September 16, 2011.

II. Defendant's Substantial Assistance

Maria Teresa Sanchez was a loan officer assistant at SunTrust Mortgage in Falls Church, Virginia from from 2003 until 2007 and from 2008 until 2011. She worked with other employees at SunTrust to submit fraudulent mortgage loan documents for individuals who could not otherwise afford mortgage loans. Sanchez and others falsified information on loan documents, including employment, income, assets, and other information in order to qualify the buyers for larger loans than they could afford. Sanchez acted as a loan officer assistant for at least six property transactions in which unqualified buyers obtained millions of dollars in mortgage loan proceeds. Victims suffered losses of over \$950,000 as a direct result of Sanchez's conduct.

Sanchez formally cooperated with the government in this case. Before and after Sanchez pleaded guilty, she met with the government and gave an extensive proffer as to her role and the role of other employees at SunTrust Mortgage with regard to mortgage fraud. Specifically, Sanchez described the manner in which she and others at SunTrust falsified borrower information in loan applications. On subsequent occasions, Sanchez met with investigators as they worked to corroborate additional information about the details of the conspiracy.

Sanchez's cooperation has provided substantial assistance to the government in a number of ways. First, Sanchez's cooperation helped confirm the individuals involved in and the scope

of the conspiracy. Second, her cooperation allowed the government to focus investigative resources on particular means in which the scheme was executed, thereby conserving resources and shortening the length of the investigation. Third, Sanchez provided information of specific instances of criminal conduct by other conspirators, which the government used during interviews with those individuals. Fourth, Sanchez provided information regarding additional fraudulent mortgage loans that the government had not yet identified. Fifth, Sanchez's cooperation assisted the government in obtaining a guilty from a loan officer and another loan officer assistant at SunTrust Mortgage. Although the government already had some evidence against these co-conspirators, Sanchez provided first-hand witness information that corroborated documentary evidence the government had already collected. Sanchez's willingness to accept responsibility, plead guilty, proffer, and potentially testify, substantially assisted the government in this investigation. Indeed, Sanchez cooperated with the government despite knowing that she may be deported as a result of her role in the conspiracy.

III. Recommendation

In accordance with the authorization of the Substantial Assistance Committee of the United States Attorney's Office, the United States recommends that the Court depart downward from the advisory sentencing guidelines and impose a term of imprisonment 50% lower than that which the Court otherwise would impose. This motion is made pursuant to Section 5K1.1 of the United States Sentencing Guidelines, and also pursuant to 18 U.S.C. § 3553(e) to the extent that it applies.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of August 2011, I filed electronically the foregoing pleading using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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